BEFORE THE TENNESSEE REGULATORY AUTHORITY AT NASHVILLE, TENNESSEE

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CONSUMER ADVOCATE DIVISION'S REQUEST TO CROSS-EXAMINE AFFIANT(S)

Comes the Consumer Advocate Division, pursuant to Tenn. Code Ann. § 4-5-313 (2) and requests the right to cross-examine Paul J. Grone and any other affiant(s) of BellSouth.

CAD further submits that said cross-examination of Mr. Grone and the affidavit submitted is not protected since affiant is an ordinary non-party witness.

Respectfully submitted,

L. Vincent Williams, 11189

Vance L. Broemel, 11421

Consumer Advocate Division

Office of the Attorney General & Reporter

425 Fifth Avenue North, Second Floor

Nashville, TN. 37243-0500

615-741-8700

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing request to cross-examine has been faxed and or mailed postage prepaid to the parties listed below this 5 day of August, 1999.

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